

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

_____)	
UNITED STATES OF AMERICA)	
)	No. 1:20-CR-00093-MSM-PAS-1
vs.)	
)	
RHODE ISLAND BEEF AND VEAL, INC.))	
_____)	

UNOBJECTED TO MOTION TO CONTINUE SENTENCING HEARING

Defendant Rhode Island Beef and Veal, Incorporated, by and through undersigned counsel, hereby moves this Honorable Court to enter an order continuing the sentencing hearing in this matter scheduled for tomorrow, March 20, 2024 to a relatively short two to three-week date in April. As the basis for this motion, undersigned counsel avers that he and his co-counsel had multiple telephone calls with the government today concerning Defendant's ability to pay a fine. From those calls, undersigned counsel is concerned that Defendant's financial condition has not been adequately described and that undersigned counsel has not yet had an opportunity to procure all pertinent documentation.

Prior to and following the conversation with the government, undersigned spoke with Certified Public Accountant ("CPA") Paul Brown who is the outside accountant for Rhode Island Beef and Veal. CPA Brown indicated that he can provide the parties with the requested information in the form of bank statements and accounting records prepared by his firm. CPA Brown has pledged to make himself available by phone if the government has any questions following its review of the financial documents. Once the accountant provides the documents to undersigned counsel and the government, undersigned counsel will transmit the records to

United States Probation in anticipation of possible revisions to the Presentence Investigation Report.

Assistant United States Attorney Milind Shah does not object to this motion.

WHEREFORE, the company respectfully asks this Court to continue the sentencing hearing in this matter to a relatively short date during the month of April 2024.

Respectfully submitted,
RHODE ISLAND BEEF AND VEAL, INC.
By Its Attorney,

/s/ Gary G. Pelletier
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Dated: March 19, 2024

CERTIFICATE OF SERVICE

I, Gary G. Pelletier, hereby certify that on March 19, 2024, I served a true copy of the within motion upon Assistant United States Attorney Milind Shaw and all other registered parties via ECF.

/s/ Gary G. Pelletier